



AUG 03 1982

Ref: 8M0

RECEIVED
AUG - 5 1982
TECHNICAL OPERATIONS SECTION

Mr. Michael Brown
EPA, Region X
1200 6th Ave.
Mail Stop 533
Seattle, WA 98101

Dear Mike:

Concerning our recent conversation about Arrcom Oil, I have enclosed a copy of an exception report from Anaconda Aluminum, a letter from the Montana Solid Waste Management Bureau and a Waste Manifest.

The incident which generated these documents was a waste shipment from Anaconda Aluminum, Columbia Falls, Montana to Arrcom Oil in Rathdrum, Idaho. Anaconda contacted the State when the hazardous waste manifest was not returned from Arrcom.

I will keep looking for any other information which may be of value to you.

Sincerely yours,

A handwritten signature in cursive script that reads "Jim Harris".

James C. Harris
Environmental Engineer

Enclosure

EPA EXHIBIT
25-10AHO

DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES
SOLID WASTE MANAGEMENT BUREAU



TED SCHWINDEN, GOVERNOR

COGSWELL BUILDING, ROOM A201

STATE OF MONTANA

(406) 449-2821

HELENA, MONTANA 59620

May 14, 1981



Ken Reick
Environmental Engineer
Anaconda Aluminum Division
P. O. Box 10
Columbia Falls, MT 59912

Dear Ken;

Enclosed is the signed original of the hazardous waste manifest, serial number 1520, for which you filed an exception report April 15, 1981. I spoke with Mr. Michael Schuler by phone on May 7, 1981 and received this manifest from him on May 11, 1981.

I have already provided the Montana Office of Region VIII EPA with a copy, so we may all close our files on this matter. We appreciate your cooperation in reporting this manifest exception in a timely manner.

Sincerely,

Roger Thorvilson

ROGER C. THORVILSON
Solid Waste Management Bureau
Environmental Sciences Division

RCT:vc

Encls.

cc: Jim Harris, Montana EPA Office, Helena, MT

ANACONDA Aluminum

Columbia Falls Reduction Plant
P.O. Box 10
Columbia Falls, Montana 59912
Telephone 406 892 3261

RECEIVED

APR 17 '81

WASTE MGT. BR.



April 15, 1981

Mr. Alan Merson
U.S. Environmental Protection Agency
Region VIII Administrator
8 AH-WM (ON)
1860 Lincoln Street
Denver, Colorado 80295

MTD057561763

Dear Mr. Merson:

This report is being submitted in accordance with 40 CFR 262.42 (Exception Reporting) as promulgated on May 19, 1980. It concerns a shipment of hazardous waste generated at the Anaconda Aluminum Company, Columbia Falls, Montana, Primary Aluminum Reduction Plant, and shipped from here on February 26, 1981.

As of April 13, 1981, the Columbia Falls plant had not received from the designated T/S/D facility a copy of the manifest accompanying this shipment. Attempts have been made to determine the disposition of this waste material through telephone conversations with the transporter and designated T/S/D facility. These attempts have not been successful. However, on April 14, 1981, the designated facility did inform us that a copy of the manifest is in the mail. We have not yet received it.

Please find attached, a copy of Manifest No. 1520. If you need further information, please contact us.

Sincerely yours, _____

ANACONDA ALUMINUM COMPANY

K. G. Reick
Environmental Engineer

KGR:hcp
Attachment

HAZARDOUS WASTE MANIFEST

STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

1520

TO: T/S/D/F Arrcom Oil	FROM: Generator Anaconda Aluminum Company
E.P.A. ID Code No. 00-080-0961	E.P.A. ID Code No. MT D057561763
Address Rural Rt. No. 3, Box 258 A 6	Address P.O.Box10, Columbia Falls, Mt. 59912
Destination Rathdrum, Id. 83858	Origin
Phone 208-687-0216	Phone 406-892-3261

No. Shipping Units	D O T PROPER SHIPPING NAME	HAZARD CLASS	Haz. Matl. ID No.	EPA Haz. Waste No.	WEIGHT	LABELS REQUIRE (or Exemption)
/	Waste Solvent Solution	Combustible	NA 1993	F001 F005	4370 lb 610 gal	None

PLACARDS REQUIRED None

ALTERNATE DESTINATION (EMERGENCY ONLY)		EMERGENCY RESPONSE INFORMATION	
T/S/D/F Arrcom Oil	CONTACT Name Tom Drexler	Phone 208-687-0607	
E.P.A. ID Code No. 00-080-0961	National Response Center	1-800-424-8800	
Address Rural Rt. No. 3, Box 258 A 6	Destination Rathdrum, Id. 83858	in D. C. 426-2675	

CERTIFICATION

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency.

Generator Signature [Signature] Date 2-26-81

TRANSPORTER #1 Arrcom Oil E.P.A. ID No. 00-080-0961
 Address R.R. #3, Box 258 A 6
 City Rathdrum State Idaho Zip 83858 Phone 208-687-0607

This is to certify acceptance of the hazardous waste shipment.

Transporter No. 10
 Signature [Signature] Date 2/26/81

TREATMENT/STORAGE/DISPOSAL/FACILITY

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.

T/S/D/F Chromes & Nickel up Drexler Ent Inc
 Signature [Signature] Date 2-28-81

DREXLER ENTERPRISES, INC.
 Rt. 3, Box 258-A6

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF: M/S 613

December 27, 1982

Mr. George W. Drexler
3731 N. 29th Street
Tacoma, Washington 98402

Re: Inspection of Records

Dear Mr. Drexler:

This is to advise you that in the immediate future, EPA employees will be inspecting records subpoenaed from you (or from companies in which you hold an interest), and presently held at the U. S. Attorney's Office in Seattle. As you know, under EPA regulations and the Resource Conservation and Recovery Act (RCRA), EPA has the right to inspect records required to be maintained for hazardous waste purposes, regardless of their location.

In particular, EPA will be reviewing the subpoenaed records for hazardous waste manifests.

Although the records came into the possession of the Government by Grand Jury subpoena, the records themselves are not "matters occurring before the grand jury" which are privileged under Federal Criminal Rule 6(e).

After the records have been inspected, EPA may request copies of them.

Sincerely,

A handwritten signature in cursive script, reading "John A. Hamill".

John A. Hamill
Assistant Regional Counsel

cc: Mike Brown
Stephen Schroeder
John Gordon

RECEIVED
DEC 29 1982

TECHNICAL OPERATIONS SECTION

EPA EXHIBIT
26-10AHO

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 533

APR 27 1983

Mr. George W. Drexler
1930 C Street
Tacoma, Washington 98402

RE: Facility No. IDD000800961

Dear ~~Dear~~ Mr. Drexler:

The enclosed COMPLAINT AND COMPLIANCE ORDER requires you to clean up spilled and/or disposed hazardous waste on your facility located at Rural Route 3 Box 258-AC, Rathdrum, Idaho; submit a Part B permit application; and remedy violations of the regulations adopted pursuant to the Resource Conservation and Recovery Act (RCRA).

The COMPLAINT AND COMPLIANCE ORDER reflects the seriousness of EPA's concern. It includes a proposed penalty of \$75,925.

I encourage you to read the COMPLAINT AND COMPLIANCE ORDER carefully and note the procedures for appeal and other options for resolution of this matter.

Sincerely,

L. Edwin Coate
Acting Regional Administrator

Enclosure

cc. Daryl Koch, Department of Health & Welfare, Boise, Idaho
Ken Gabin, Panhandle Health District
Steve Provant, EPA, Boise, Idaho

bcc. Judy Fey, EPA, M/S 533

WMB:MBrown:nay:4-26-83:1503G & 1510G

CONCURRENCES

MBOL	WMB	WMB	AWMD	AWMD		EPA EXHIBIT
RNAME	Hofer	Feigner	Findley	Smith		
TE						27-IDAHO

PS Form 3811, Dec. 1980

- **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space
on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

- ☒ Show to whom and date delivered —c
☐ Show to whom, date, and address of delivery.. —c

- 2.
- ☐
- RESTRICTED DELIVERY**
- c

(The restricted delivery fee is charged in addition to
the return receipt fee.)

TOTAL \$

3. **ARTICLE ADDRESSED TO:**

Mr. George W. Drexler
1930 C Street
Tacoma, WA 98402

4. **TYPE OF SERVICE:**

- ☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER

P15 3403337

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

George Drexler
11/55/72

5. **DATE OF DELIVERY****POSTMARK**6. **ADDRESSEE'S ADDRESS** (Only if requested)7. **UNABLE TO DELIVER BECAUSE:**7a. **EMPLOYEE'S INITIALS**

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P15 3403337

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		Mr. George W. Drexler
STREET AND NO.		1930 C Street
P.O., STATE AND ZIP CODE		Tacoma, WA 98402
POSTAGE		\$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	c
	SPECIAL DELIVERY	c
	RESTRICTED DELIVERY	c
	OPTIONAL SERVICES	
	RETURN RECEIPT SERVICE	
	SHOW TO WHOM AND DATE DELIVERED	c
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY	c
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	c
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	c
TOTAL POSTAGE AND FEES		\$
POSTMARK OR DATE		

PS Form 3800, Apr. 1976

Crutcher

AFFIDAVIT OF SERVICE

Affiant undersigned, upon oath, desposes and says:

that on June 28, 1983 at 2:00 P.m., at the
location of:

FCI FT WORTH
Ft. Worth, TX

affiant personally delivered a true copy of the EPA RCRA Docket
X83-04-01-3008 and RCRA Docket X83-04-02-3008 Complaint and Compliance
Order into the hands of George W. Drexler, who is an individual above the
age of 18.

CLINT T. PEOPLES, USM
N/TX

BY Michael L. Richards USM N/TX
Affiant

SUBSCRIBED AND SWORN to before me this _____ day of _____,
19____.

NOTARY PUBLIC in and for the
State of _____
Residing at _____
My commission expires _____

Original in Austin - Torana file

UNITED STATES DEPARTMENT OF JUSTICE
U.S. MARSHALS SERVICE



MICHAEL L. RICHARDS
DEPUTY U.S. MARSHAL

A.C.
214-767-0837
NORTHERN DISTRICT OF TEXAS
1100 COMMERCE ST. 16F47
DALLAS, TEXAS 75242
FTS
729-0836

UNITED STATES DEPARTMENT OF JUSTICE
U.S. MARSHALS SERVICE



LEE A. METZGER
SUPERVISORY DEPUTY UNITED STATES MARSHAL

A.C.
214-767-0836
NORTHERN DISTRICT OF TEXAS
1100 COMMERCE ST. 16F47
DALLAS, TEXAS
FTS
729-0836

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 533

APR 27 1983

Arrcom Incorporated
1930 C Street
Tacoma, Washington 98402

RE: Facility No. ID0000800961

Dear To Whom It May Concern:

The enclosed COMPLAINT AND COMPLIANCE ORDER requires you to clean up spilled and/or disposed hazardous waste on your facility located at Rural Route 3 Box 258-A6, Rathdrum, Idaho; submit a Part B permit application; and remedy violations of the regulations adopted pursuant to the Resource Conservation and Recovery Act (RCRA).

The COMPLAINT AND COMPLIANCE ORDER reflects the seriousness of EPA's concern. It includes a proposed penalty of \$75,925.

I encourage you to read the COMPLAINT AND COMPLIANCE ORDER carefully and note the procedures for appeal and other options for resolution of this matter.

Sincerely,

L. Edwin Coate
Acting Regional Administrator

Enclosure

cc. Daryl Koch, Department of Health & Welfare, Boise, Idaho
Ken Babin, Panhandle Health District
Steve Provant, EPA, Boise, Idaho

bcc. Judy Fey, EPA, M/S 533

WMB:MBrown:nay:4-26-83:1503G & 1510G

CONCURRENCES					
MBOL	WMB	WMB	AWMD	AWMD	EPA EXHIBIT 28-IDAHO
NAME	Hofer	Feiguer	Findley	Smith	
TE					

Form 1320-1 (10-78)

PS Form 3811, Dec. 1970

SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☒ Show to whom and date delivered
☐ Show to whom, date, and address of delivery ..
 2. ☐ **RESTRICTED DELIVERY**
 (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:
 Arrcom Incorporated
 1930 C Street
 Tacoma, WA 98402

4. TYPE OF SERVICE: ARTICLE NUMBER
☐ REGISTERED ☐ INSURED P15 3403336
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
John B. ...

5. DATE OF DELIVERY: POSTMARK
 9/29/83 53

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: 7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P15 3403336

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO
 Arrcom Incorporated
 STREET AND NO.
 1930 C Street
 P.O., STATE AND ZIP CODE
 Tacoma, WA 98402

POSTAGE \$

CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		\$
	OPTIONAL SERVICES	SPECIAL DELIVERY	\$
		RESTRICTED DELIVERY	\$
		RETURN RECEIPT SERVICE	\$
	SHOW TO WHOM AND DATE DELIVERED	\$	
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	\$	
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	\$	
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	\$	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE			

PS Form 3800, Apr. 1976

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 533

APR 27 1983

Mr. Warren Bingham

(b) (6)

RE: Facility No. IDD000800961

Dear Dear Mr. Bingham:

The enclosed COMPLAINT AND COMPLIANCE ORDER requires you to clean up spilled and/or disposed hazardous waste on your facility located at Rural Route 3 Box 258-A6, Ratndrum, Idaho; submit a Part B permit application; and remedy violations of the regulations adopted pursuant to the Resource Conservation and Recovery Act (RCRA).

The COMPLAINT AND COMPLIANCE ORDER reflects the seriousness of EPA's concern. It includes a proposed penalty of \$75,925.

I encourage you to read the COMPLAINT AND COMPLIANCE ORDER carefully and note the procedures for appeal and other options for resolution of this matter.

Sincerely,

L. Edwin Coate
Acting Regional Administrator

Enclosure

cc. Daryl Koch, Department of Health & Welfare, Boise, Idaho
Ken Babin, Panhandle Health District
Steve Provant, EPA, Boise, Idaho

bcc. Judy Fey, EPA, M/S 533

WMB:MBrown:nay:4 26 83:1503C & 1510C

CONCURRENCES						EPA EXHIBIT
SYMBOL	WMB	WMB	AWMD	AWMD		
	Hofer	Feigner	Findley	Smith		29- IDAHO
SURNAME						
DATE						OFFICIAL FILE COPY

PS Form 3811, Dec. 1980

- **SENDER:** Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO" space
on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

☒ Show to whom and date delivered —¢
☐ Show to whom, date, and address of delivery.. —¢

- 2.
- ☐
- RESTRICTED DELIVERY**

(The restricted delivery fee is charged in addition to
the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:

Mr. Warren Bingham
 (b) (6)

4. TYPE OF SERVICE:

☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COD
☐ EXPRESS MAIL

P15 3403339

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

Warren W. Bingham
 5. DATE OF DELIVERY
 MAY - 3 1983

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

P15 3403339

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO

Mr. Warren Bingham
 (b) (6)

POSTAGE

\$

CERTIFIED FEE

¢

SPECIAL DELIVERY

¢

RESTRICTED DELIVERY

¢

CONSULT POSTMASTER FOR FEES
 OPTIONAL SERVICES
 RETURN RECEIPT SERVICE

SHOW TO WHOM AND
DATE DELIVERED

¢

SHOW TO WHOM, DATE
AND ADDRESS OF
DELIVERY

¢

SHOW TO WHOM AND DATE
DELIVERED WITH RESTRICTED
DELIVERY

¢

SHOW TO WHOM, DATE AND
ADDRESS OF DELIVERY WITH
RESTRICTED DELIVERY

¢

TOTAL POSTAGE AND FEES

\$

POSTMARK OR DATE

PS Form 3800, Apr. 1976

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 533

APR 27 1983

W. A. Pichett
P. O. Box 125
Otis Orchards, Washington 99027

RE: Facility No. IDD000800961

Dear Mr. Pichett:

The enclosed COMPLAINT AND COMPLIANCE ORDER requires you to clean up spilled and/or disposed hazardous waste on your facility located at Rural Route 3 Box 258-A6, Rathdrum, Idaho; submit a Part B permit application; and remedy violations of the regulations adopted pursuant to the Resource Conservation and Recovery Act (RCRA).

The COMPLAINT AND COMPLIANCE ORDER reflects the seriousness of EPA's concern. It includes a proposed penalty of \$75,925.

I encourage you to read the COMPLAINT AND COMPLIANCE ORDER carefully and note the procedures for appeal and other options for resolution of this matter.

Sincerely,

L. Edwin Coate
Acting Regional Administrator

Enclosure

cc. Daryl Koch, Department of Health & Welfare, Boise, Idaho
Ken Babin, Panhandle Health District
Steve Provant, EPA, Boise, Idaho

bcc. Judy Fey, EPA, M/S 533

WMB:MBrown:nay:4-26-83:1503G CONCURRENCES

SYMBOL	WMB	WMB	AWMD	AWMD		EPA EXHIBIT
	Hofner	Faigner	Findley	Smith		
SURNAME						
DATE						

AFFIDAVIT OF SERVICE

Affiant undersigned, upon oath, desposes and says:

On June 6, 1983 at 7:30 pm., at the location of:

803 E. Mission Street

Spokane, Washington

affiant personally delivered a true copy of the EPA RCRA Docket
X-83-04-02-3008 Complaint and Compliance Order into the hands of W. A.
Pickett, who is an individual above the age of 18.

Michael J. Brown
Affiant

SUBSCRIBED AND SWORN to before me this 9th day of June,
19 83.

Thomas L. Atkinson
NOTARY PUBLIC in and for the
State of Washington
Residing at Seattle
My commission expires 2/28/87

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

M/S 533

APR 27 1983

Mr. Thomas Drexler
Rural Route 3, Box 258-A6
Rathdrum, Idaho 83858

RE: Facility No. IDD000800961

Dear Mr. Drexler:

The enclosed COMPLAINT AND COMPLIANCE ORDER requires you to clean up spilled and/or disposed hazardous waste on your facility located at Rural Route 3 Box 258-A6, Rathdrum, Idaho; submit a Part B permit application; and remedy violations of the regulations adopted pursuant to the Resource Conservation and Recovery Act (RCRA).

The COMPLAINT AND COMPLIANCE ORDER reflects the seriousness of EPA's concern. It includes a proposed penalty of \$75,925.

I encourage you to read the COMPLAINT AND COMPLIANCE ORDER carefully and note the procedures for appeal and other options for resolution of this matter.

Sincerely,

L. Edwin Coate
Acting Regional Administrator

Enclosure

cc. Daryl Koch, Department of Health & Welfare, Boise, Idaho
Ken Babin, Panhandle Health District
Steve Provant, EPA, Boise, Idaho

bcc. Judy Fey, EPA, M/S 533

WMB:MBrown:nay:4-26-83:1503G & 1510G

SYMBOL	WMB	WMB	CONCURRENCES			
SURNAME	Hofer	Feigner	Findley	Smith		EPA EXHIBIT
DATE						31-IDAHO

AFFIDAVIT OF SERVICE

Affiant undersigned, upon oath, desposes and says:

On June 7, 1983 at 10:30 am., at the location of:

W 356 Washington Street

Rathdrum, Idaho 83858

affiant personally delivered a true copy of the EPA RCRA Docket
X83-04-02-3008, Complaint and Compliance Order into the hands of a woman,
who is an individual above the age of 18, who identified herself as the
wife of Thomas Drexler.

Michael A. Brown

Affiant

SUBSCRIBED AND SWORN to before me this 7th day of June,
19 83.

Mervin L. Atkansi
NOTARY PUBLIC in and for the
State of Washington
Residing at Seattle
My commission expires 2/28/87

MG
Annam Rathbun

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

IN THE MATTER OF:

Environmental Protection Agency

Complainant,

v.

Arrcom Incorporated,
Drexler Enterprises Incorporated,
George W. Drexler (Operator),
Thomas Drexler (Operator),
W. A. Pickett (Operator),
Warren Bingham (Owner),

Respondents.

RCRA Docket X-83-04-02-3008

COMPLAINT AND
COMPLIANCE ORDER

COMPLAINT

This is a civil administrative action initiated pursuant to Section 3008(a) of the Resource Conservation and Recovery Act [42 U.S.C. 6928(a)], hereinafter referred to as "the Act." The Complainant is Region 10 of the United States Environmental Protection Agency (EPA). Based on a compliance inspection conducted on July 20, 1982, by EPA and the Panhandle Health District I (Idaho), Complainant has reason to believe that the above-named Respondents have violated Section 3005 of the Act (42 U.S.C. 6925) as follows:

COMPLAINT AND COMPLIANCE ORDER--Page 1 of 12

EPA EXHIBIT
31-IDAHO

FINDINGS OF FACT

1
2 1. Respondents have operated a facility (ID0000800961) for the
3 treatment, storage, and/or disposal of hazardous waste since January 1,
4 1980, located at 5 miles East of the Stateline on Highway 53, Rathdrum,
5 Idaho (mailing address: Rural Route 3, Box 258-A6, Rathdrum, Idaho
6 83858). Furthermore, Respondents are transporters of hazardous waste.
7 Hazardous waste manifests from the United Paint Manufacturing Company,
8 Washington (nine manifests from November 19, 1980 to December 3, 1981)
9 and the Anaconda Aluminum Company, Montana (one manifest dated February
10 26, 1981) document these activities.

11 2. Respondents submitted a Notification of Hazardous Waste Activity
12 (EPA Form 8700-12) which was received by EPA on August 20, 1980. This
13 notification satisfied 3010(a) of the Act and 40 CFR 122.21(c)
14 [recodified on April 1, 1983 as 40 CFR 270.1(b)]. This notification
15 indicated that Respondents were generators and also treaters, storers,
16 and/or disposers of hazardous waste.

17 3. 40 CFR Part 262 establishes standards for all hazardous waste
18 generators. Respondents are generators of hazardous waste as evidenced
19 by the Notification of Hazardous Waste Activity.

20 4. Respondents submitted a Part A permit application (EPA Form
21 3510-1) which was received by EPA on November 19, 1980, as required by 40
22 CFR 122.22 [recodified on April 1, 1983 as 40 CFR 270.10]. This
23 application stated that the Respondents were storers and treaters of
24 hazardous waste.

25 5. 40 CFR Part 265 establishes standards for all hazardous waste
26 treatment, storage, and disposal facilities. These standards apply until
27 final administrative disposition of permit applications submitted by
28 COMPLAINT AND COMPLIANCE ORDER--Page 2 of 12

1 owners and operators of facilities has been made. No such disposition
2 has been made with respect to Respondents' facility. Thus, the standards
3 of 40 CFR Part 265 apply thereto.

4 6. Respondents submitted a Part A permit application without having
5 a proper signatory for the permit as required by 40 CFR 122.4(b)
6 [recodified on April 1, 1983 as 40 CFR 270.10(b)]. W. A. Pickett, an
7 employee for Respondent George W. Drexler (operator), signed the Owner
8 Certification of the application. Respondent Warren Bingham (owner)
9 stated to EPA on July 9, 1982, that he had not authorized W. A. Pickett
10 to sign the Part A permit application as the owner of the facility.

11 7. Complainant, in a letter dated February 9, 1982, requested that
12 Respondent submit a corrected Part A permit application or submit a
13 closure plan. Respondents have subsequently stopped operation but have
14 neither resubmitted the Part A permit application nor submitted a closure
15 plan. As evidenced in paragraph 8, below, hazardous waste remains
16 onsite; therefore, the facility has not been properly closed as required
17 by 40 CFR 265.111.

18 8. Respondents spilled and/or disposed hazardous waste or hazardous
19 waste constituents into the soil surrounding the Shaker Building of the
20 facility. Such release of hazardous waste or hazardous waste
21 constituents into the environment constitutes disposal. The facility has
22 not qualified for "interim status" for disposal and therefore is in
23 violation of Section 3005 of the Act. Samples of contaminated soil and
24 of spilled material taken during an inspection conducted by EPA employees
25 on July 20, 1982, and subsequently analyzed revealed the following
26 hazardous wastes constituents: 1,1,1-trichloroethane; ethylbenzene;
27 methylene chloride; and toluene. Spent ethylbenzene and toluene were
28 COMPLAINT AND COMPLIANCE ORDER--Page 3 of 12

1 reported in the Respondents' Part A permit application (EPA Hazardous
2 Waste Codes F003 and F005, respectively).

3 9. Respondents further failed to comply with the regulatory
4 requirements applicable to a hazardous waste management facility in that
5 they failed:

- 6 (a) to prevent the unknowing entry and to minimize the possibility
7 for the unauthorized entry of persons or livestock as required
8 by 40 CFR 265.14. Fencing at the site did not completely
9 surround the active portion of the facility,
- 10 (b) to maintain and operate the facility to minimize the possibility
11 of any release of hazardous waste as required by 40 CFR 265.31,
- 12 (c) to have an external communication device capable of summoning
13 emergency assistance and to maintain fire control equipment as
14 required by 40 CFR 265.32, and
- 15 (d) to submit financial assurance and liability documents as
16 required by 40 CFR 265, Subpart H.

17 10. Complainant's review of Respondents' records revealed that the
18 Respondents failed:

- 19 (a) to develop a written waste analysis plan as required by 40 CFR
20 265.13(b),
- 21 (b) to develop a written inspection schedule for inspections as
22 required by 40 CFR 265.15(b)(1),
- 23 (c) to develop a written training schedule and maintain records as
24 required by 40 CFR 265.16,
- 25 (d) to attempt to make contingency arrangements with local
26 authorities as required by 40 CFR 265.37,

- 1 (e) to develop contingency plan and emergency procedures as
2 required by 40 CFR 265.51(a),
3 (f) to maintain manifests and operating records required by 40 CFR
4 265.71 and 40 CFR 265.73, respectively, and
5 (g) to develop a closure plan as required by 40 CFR 265, Subpart G.

6 PROPOSED CIVIL PENALTY

7 In view of the above-cited violations, Complainant proposes to assess
8 a penalty of SEVENTY-FIVE THOUSAND NINE HUNDRED AND TWENTY-FIVE DOLLARS
9 (\$75,925), computed in accordance with EPA Guidelines for penalties
10 assessed under the Act, as follows:

11	<u>Violation</u>	<u>Proposed Penalty</u>
12	*40 CFR 122.4(b)	\$ 22,500
13	RCRA Section 3005	\$ 22,500
14	40 CFR 265.13(b)	\$ 4,500
15	40 CFR 265.14	\$ 2,550
16	40 CFR 265.15(b)(1)	\$ 1,975
17	40 CFR 265.16	\$ 800
18	40 CFR 265.31	\$ 2,500
19	40 CFR 265.32	\$ 9,900
20	40 CFR 265.37	\$ 800
21	40 CFR 265.51(a)	\$ 1,975
22	40 CFR 265.71(a)(5)	\$ 1,975
23	40 CFR 265.73	\$ 1,975
24	40 CFR 265.112	<u>\$ 1,975</u>
25	Total	\$ 75,925

26
27 *Recodified on April 1, 1983 as 40 CFR 270.10(b)

COMPLIANCE ORDER

Based on the foregoing and pursuant to Section 3008 of the Act, it is hereby ordered that the Respondents take the following actions within the time periods specified:

1. Respondents shall immediately upon receipt of this Order, develop a written plan to cleanup the hazardous waste and hazardous waste constituents that have spilled or were otherwise released onto the ground or into ground-water, and/or that have migrated into the ground or into ground-water. This plan shall address the cleanup and disposition of all contaminated soil, water and ground-water such that all remaining soil, water, and ground-water are at background level. This plan shall also address the sampling and analysis necessary to confirm adequate cleanup. This plan shall be submitted to Mr. George Hofer at the U.S. Environmental Protection Agency, 1200 Sixth Avenue, Seattle, WA 98101-3188 within 20 days of receipt of this Order. This plan, after modification and approval by EPA, shall be implemented within five (5) days of EPA's approval and completed as expeditiously as possible but in no event later than thirty (30) days after EPA approval.

2. Respondents shall within one hundred and eighty (180) days of receipt of this Order submit a Part B permit application in accordance with 40 CFR 122.22(a)(4) [recodified on April 1, 1983 as 270.10(e)(4)]. This Part B permit application shall address the relevant requirements listed in 40 CFR 122.25 [recodified on April 1, 1983 as 40 CFR 270.14 thru 270.21]. This order constitutes a formal request for a Part B permit application pursuant to 40 CFR 122.22(a)(4) [recodified on April 1, 1983 as 270.10(e)(4)]. This Part B permit application shall be submitted to Mr. George Hofer at the address listed in paragraph 1.

1 Failure to submit a complete application may result in further
2 enforcement action and will result in the initiation of permit denial,
3 which will terminate interim status for this facility in accordance to 40
4 CFR 122.22(a)(5) [recodified on April 1, 1983 as 40 CFR 270.10(e)(5)].

5 3. Respondents shall comply with either paragraphs 4 and 5 or
6 paragraphs 6 thru 8 (inclusive). Respondents shall, within fifteen (15)
7 days of receipt of this Order, state in a letter to Mr. George Hofer at
8 the above address which option has been chosen.

9 4. If Respondents elect to permanently cease operation as a hazardous
10 waste facility, Respondents shall submit a written statement to Mr.
11 George Hofer at the above address which contains the following within
12 fifteen (15) days of receipt of this Order:

13 (a) Request for EPA to deny Respondents' Part B permit application.

14 (b) Waiver of the one hundred and eighty (180) day Part B
15 preparation period allowed for in 40 CFR 122.22 [recodified on
16 April 1, 1983 as 40 CFR 270.10].

17 (c) Declaration that Respondents will cease operation immediately
18 and will close the facility within one hundred and eighty (180)
19 days.

20 5. Respondents shall submit an appropriate closure plan in
21 accordance with 40 CFR 265, Subpart G within thirty (30) days of receipt
22 of this Order. Closure of this facility shall commence upon submission
23 and Complainant's approval of the plan and shall be accomplished as
24 expeditiously as possible but in no event later than one hundred and
25 eighty (180) days from the receipt of this Order. The Closure Plan shall
26 be submitted to Mr. George Hofer at the above address.

1 6. Respondents shall immediately upon receipt of this Order
2 initiate the following activities:

- 3 (a) Inspect the facility for discharge of hazardous waste and for
4 deterioration of containers, tanks, and equipment as required by
5 40 CFR 265.15(a) and (c), 40 CFR 265.174, and 40 CFR 265.194.
6 (b) Maintain personnel training records as required by 40 CFR 265.16.
7 (c) Maintain manifest copies as required by 40 CFR 265.71.
8 (d) Maintain operating records as required by 40 CFR 265.73.

9 7. Respondents shall immediately on the receipt of this Order
10 institute the following activities and complete these activities
11 as expeditiously as practicable but in no event later than
12 thirty (30) days after the receipt of this Order:

- 13 (a) Remedy any deterioration of tanks and equipment revealed through
14 inspection pursuant to 40 CFR 265.15(c).
15 (b) Install required communication and emergency equipment as
16 required by 40 CFR 265.32.
17 (c) Make contingency arrangements with local authorities as required
18 by 40 CFR 265.37.
19 (d) Install needed security system as required by 40 CFR 265.14.

20 8. Respondents shall submit to George Hofer at the above address,
21 within thirty (30) days of the receipt of this Order, the
22 following:

- 23 (a) A Part A application containing the proper signatures as
24 required by 40 CFR 122.4(b) [recodified on April 1, 1983 as 40
25 CFR 270.10(b)].
26 (b) Inspection Plan to satisfy 40 CFR 265.15(b)(1).
27

1 (c) Training Plan to satisfy 40 CFR 265.16.

2 (d) Contingency Plan to satisfy 40 CFR 265, Subpart D.

3 (e) Closure Plan to satisfy 40 CFR 265, Subpart G.

4 (f) Financial assurance and liability documents to satisfy 40 CFR
5 265, Subpart H.

6
7 OPPORTUNITY TO REQUEST A HEARING

8 A copy of the "Consolidated Rules of Practice" governing these
9 penalty proceedings is attached. Under those rules Respondents have the
10 right to request a hearing:

11 (a) to contest any material fact set forth in the Complaint, or

12 (b) to contest the appropriateness of the proposed penalty, or

13 (c) to contend that Respondents are entitled to judgment as a matter
14 of law.

15 To avoid being found in default, having the proposed civil penalty
16 assessed, and the Compliance Order becoming final without further
17 proceedings, Respondents must file a written response to the
18 Complainant. Respondents' written response may include a request for a
19 hearing, if desired. The response (if any) must be addressed to the
20 Region 10 Hearing Clerk, Office of Regional Counsel, U.S. Environmental
21 Protection Agency, M/S 613, 1200 Sixth Avenue, Seattle, Washington
22 98101-3188 and sent within thirty (30) days of Respondents' receipt of
23 this Complaint and Compliance Order. Respondents' response should
24 clearly and directly admit, deny, or explain each of the factual
25 allegations contained in the Complaint about which Respondents have any
26 knowledge. The response should contain: (1) a definite statement of the

1 facts which constitute the grounds of defense, and (2) a concise
2 statement of the facts Respondents intend to place at issue in the
3 hearing if requested.

4 If Respondents fail to file a written answer within thirty (30) days
5 of receipt of this Complaint and Compliance Order, such failure
6 constitutes an admission of all the facts alleged in the Complaint and a
7 waiver of Respondents' right to a hearing. A final order upon default
8 will thereafter be issued by the Regional Administrator and filed with
9 the Region 10 Hearing Clerk.

10 Any hearing requested by Respondents will likely be held at the
11 Region 10 office of EPA in Seattle. Hearings held will be conducted in
12 accordance with the attached Consolidated Rules of Practice (40 CFR Part
13 22 (45 FR 24363)).

14
15 INFORMAL SETTLEMENT CONFERENCE

16 Whether or not Respondents requests a hearing, EPA encourages
17 settlement of this proceeding consistent with the provisions of the Act.
18 At an informal conference with representatives of the Complainant,
19 Respondents may comment on the charges and provide whatever additional
20 information Respondents believe is relevant to the disposition of this
21 matter, including any actions Respondents have taken to correct the
22 violations and any other special circumstances Respondents care to raise.

23 Respondents' request for an informal conference and other questions
24 that Respondents may have regarding this Complaint should be directed, in
25
26
27

1 writing, to Mr. Kenneth D. Feigner, U.S. Environmental Protection Agency,
2 Region 10, M/S 533, 1200 Sixth Avenue, Seattle, Washington 98101-3188, or
3 by telephone to Mr. Feigner at (206) 442-2782.

4 Please note that a request for an informal settlement conference does
5 not extend the thirty (30) day period during which a written answer and
6 request for hearing must be submitted. The informal settlement
7 conference procedure may be pursued simultaneously with the adjudicatory
8 hearing procedure. Any settlement which may be reached as a result of
9 such conference will be embodied in a written Agreed Final Compliance
10 Order to be issued by the Regional Administrator of EPA, Region 10, and
11 signed by Respondents. Respondents' signing of such Agreed Final
12 Compliance Order would constitute a waiver of Respondents' right to
13 request a hearing on any matter stipulated therein.

14 15 NOTICE OF LIABILITY FOR ADDITIONAL CIVIL PENALTIES

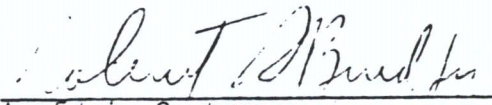
16 Pursuant to the terms of Section 3008(a)(3) of the Act, a violator
17 failing to take corrective action within the time specified in a Final
18 Compliance Order is liable for a civil penalty of up to TWENTY-FIVE
19 THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance.

20 21 RESOLUTION OF THIS PROCEEDING WITHOUT HEARING OR CONFERENCE

22 Instead of filing an answer requesting a hearing or requesting an
23 informal settlement conference, Respondents may choose to comply with the
24 terms of the Compliance Order, and to pay the proposed penalty. In that
25 case, payment should be made by sending to the Regional Hearing Clerk,
26 U.S. Environmental Protection Agency, Region 10, M/S 613, 1200 Sixth
27 Avenue, Seattle, Washington, 98101-3188, a cashier's check or certified
28 COMPLAINT AND COMPLIANCE ORDER--Page 11 of 12

1 check payable to "Treasurer, United States of America" in the amount
2 specified in the "Proposed Civil Penalty" section of this Complaint and
3 Compliance Order.

4
5 DATED this APR 27 1983 day of _____ 1983.

6
7 
8 L. Edwin Coate
9 Acting Regional Administrator
10
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28

Pending Worksheet

Amicus Bulletin 17000/080/0961

4-26-93

Miller/Bauer

Item #	RCRA Cite	Description	Class	Design	Control	Upper	Lower	Actual	Notes
1	40 CFR 122.4(b)	Signature	I	Woj	Woj	25,000	20,000	22,500	
2	RCRA 300.5	Disposing w/o permit	I	Woj	Woj	25,000	20,000	22,500	
3	265.14	Security Operate	I	Min	Woj	2,800	2,300	2,550	simulate RCRA 300.5
4	265.31	WIA release	I	Min	Min	2,500	500	2,500	
5	265.32	Safety Equipment	I	Med	Woj	11,000	8,800	9,900	
6	Subpart H	Financial	I	Woj	Woj	-	-	-	Not operating on effective date
7	265.12(b)	Waste analysis	III	Woj	Woj	5000	4000	4,500	←
8	265.15(b)(1)	inspection schedule	III	Med	Woj	2,200	1,750	1,975	
9	265.16	Training schedule	III	Min	Woj	950	755	800	
10	265.37	contingency arrangements	III	Min	Woj	950	750	800	
11	265.51(b)	contingency plan	III	Attained	Woj	2,200	1,750	1,975	
12	265.71	manifest	III	Woj	Woj	2,200	1,750	1,975	
13	265.73	operating	III	Woj	Woj	2,200	1,750	1,975	
14	Subpart G	closure plan	III	Med	Woj	2,200	1,750	1,975	
15								71,925	
16								25,925	

EPA EXHIBIT
33-10440

RECEIVED

MAY 18 1983

OFFICE OF
REGIONAL ADMINISTRATOR

George
4760 Mt. Aukum Road
Placerville, CA 95667
May 14, 1983

RECEIVED

MAY 20 1983

WASTE MANAGEMENT BRANCH

L. Edwin Coate
Acting Regional Administrator
U. S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, WA 19101

RE: Facility No. IDD0008000961

Dear Mr. Coate:

I received your "Order of Compliance" and hope I can give you information to help you clear up this contamination problem. I am not and have never operated either of the two oil plants.

I loaned George Drexler a considerable amount of my life savings. He put up his two plants as collateral to secure my loan. It was arranged as a sale-leaseback. When the Drexlers failed to make the lease payments, I spent from March, 1981, until January, 1982, in litigation trying to recover the security (the two plants). They were awarded to me in January, 1982. The plants were closed then and have never been reopened or operated. I did not see the Rathdrum plant until May of 1982.

I knew nothing of the kinds of oil being processed. I was never informed of this. Drexler and his sons and Pickett, Johns, and Foss are the people who were responsible for the operation and all matters pertaining to it. When I visited Drexler in 1979, he assured me he was recycling used motor oil. He never mentioned to me that he was even considering the handling of hazardous waste, so I had no knowledge of it.

I've tried to sell the properties since acquiring them in 1982, without any success. Now it appears I cannot get clear title to the Rathdrum plant. I was advised by my attorneys to pay Pickett the balance that Drexler owed him, to which I expected clear title. Drexler was to have paid Pickett off long before I had to take over. I don't know how this will be settled at the present time. Pickett threatened to foreclose so I made the payments before the clear title situation was clarified, on the advice of my attorneys.

I received no communication from EPA until July, 1982. I have been cooperating with Michael Brown of Seattle and Athena Lalikso of the Boise office since then.

EPA EXHIBIT
34-10AHO

L. Edwin Coate
May 14, 1983
Page 2

When Drexler left the plants, he, his sons and employees created this serious problem. They just picked up and left the mess and did not use your guidelines to do so.

In answer to Page 3, Paragraph 6, Pickett never communicated with me or got my approval for signing as owner of the property. They could have had my address and telephone number anytime by calling their Woodland office.

The total sum that I have lost due to this deal with Drexler is over \$400,000. This is the majority of my life savings. I have no income from this lost money now. I am not able to invest more money in this Rathdrum property to keep it or clean it up. Drexler and his sons and operators are financially responsible to bring this plant back to a safe condition. They are still in the oil business.

I do not know how to answer any of the other points in your "Order of Compliance." I would like to have an informal hearing, if you feel I could give you any more information in person. I will call Mr. Kenneth D. Deinger to ask for an informal hearing appointment, and if you feel I can help more, I shall come to the hearing. Please let me know immediately, as I have affairs to take care of here in California.

Very truly yours,

Warren W. Bingham
Warren W. Bingham

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☒ CONFERENCE
☐ OTHER (SPECIFY)

TO: File

(Record of item checked above)

FROM: Mike Brown
RCRA - CAPS

DATE 5-26-83

TIME PM

SUBJECT

Bryghams and clean up at Arcum Refractory

SUMMARY OF COMMUNICATION

People: Warren Brygham
 Linda Brygham (wife)
 Ken Feiguer
 George Hofer
 Mike Brown
 Mike Garcia (part time)

- Discussion started with a history of Bryghams relationship with Dexter. Ken Feiguer state EPA position about responsibility for clean up.
- Mike Garcia reinforced this situation.
- Decision at a separate meeting to attempt to have site investigation to Superfund
- new names

Don Fry - Brygham lawyer in hargrave

Norm Jessel - Pickett's lawyer in (over D'Alene (667-7016))

Mr. Foss - Dexter's accountant in Tacoma who claimed to be a partner with Dexter in Arcum

CONCLUSIONS, ACTION TAKEN OR REQUIRED

Mr. Johns - works for Foss as accountant

INFORMATION COPIES

TO:

EPA EXHIBIT

Compliance Meeting

5-26-83

Michael J. Brown

EPA

George C. Hofer

EPA

Kenneth D. Feigner

EPA

Sandra E. Benighem

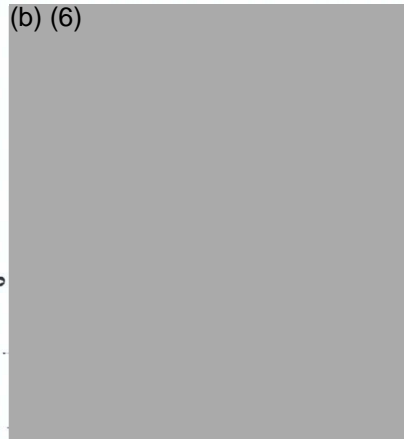
916

Warren W. Benighem

Michael J. Brown

EPA

(b) (6)



May 27, 1983

Mr Ken Feigner
U S Environmental Protection Agency
1200 Sixth Ave
Seattle, Washington 98101-3188

This letter will inform you that, as the owner of the Kothdrum Waste Oil Plant, we have no intention of using this facility for a Hazardous Materials processing in the future.

This plant was built to process and recycle waste oil and as a small re-refining plant so you can cancel the present permit.

Warren W. Dingman

received Mike Brown
12-20-83

EPA EXHIBIT
36-10AHO

June 27, 1983

Region 10 Hearing Clerk
Office of Regional Counsel
U.S. Environmental Protection Agency
M/S 613
1200 Sixth Ave
Seattle, Washington

RE: Facility No. IDD000800961

Dear Sirs;

My response to your Complaint and Compliance Order is as follows. I have never been an operator of the facility in question on Hwy 53 near Rathdrum, Idaho. The plant was operated by Arrcom Inc/ Drexler Enterprises, Inc. both wholly owned by George Drexler. I was an employee of Arrcom, Inc./Drexler Enterprises, Inc. and did not work at the facility but rather out of my office, apartment, in Spokane, Washington.

Tom Drexler was the plant manager and physically ran the facility. He made all decisions as to construction of tankage, fences, buildings, and etc. At one time land was cleared for a fence, but he chose not to do it. Also all manifests were processed by him, so I don't know the procedures involved.

To my knowledge Mr. Warren Bingham did not own any of the properties until he foreclosed on a loan note held by George Drexler, during November or December of 1981. Up until that time Mr. Bingham had absolutely nothing to do with Arrcom or the running of the plant.

Until Arrcom, Inc./George Drexler stopped meeting his payroll in December of 1981, every attempt was being made to correctly process the required paper work. I was in constant contact with Linda Dawson of the EPA to accomplish this. About this period of time all of the incomplete forms, letters and etc. were turned over to George Drexler and A. N. Foss of A. N. Foss Accountants of Tacoma. I understood they were in the process of negotiating a lease or buy-back for the Idaho plant and planned to reopen in the near future. When the paperwork package was given to them, I emphasized to them, the importance of contacting Linda Dawson and keep her apprised of the situation and what would be required.

Since I have not worked for Arrcom/ Drexler for 1 1/2 years, I have no authorization to do any thing in their behalf; however, I believe A. N. Foss has power of attorney. George Drexler did at one time indicate a desire to clean the facility, but since Bingham foreclosed no Arrcom personnel can enter the premises.

Sincerely,

W. A. Pickett

EPA EXHIBIT
37-IDAHO

A?W
Brown

June 27, 83

US Environmental Protection Agency

Mr. George Hufen

RECEIVED
JUL - 1 1983

TECHNICAL OPERATIONS SECTION

Dear Mr George Hufen:

This is to let you know that I Thomas Drexler was not a operator of Arrium or Drexler's Enterprises. As you people thing, I was a employee just like anyone else who work there. I worked for Arrium from April 15-79 to JAN, 4, 81 That's when WARREN Bingham close the plant in Rathdrum IDAHO. he lock the gates and had a COURT order to keep everyone out of the plant. And as far as I know he still Does.

About the PLANT my job was to run the steam Boiler and them-oil heater to heat waste oil so it could be shipped to Arrium in woodland WASH. The plant itself was only A holding-storage Area the plant thiner that was pick-uped by united Tring Co was used AS A fuel to Run the Boilers And

page 1

RECEIVED

JUN 29 1983

OFFICE OF
REGIONAL ADMINISTRATION

EPA EXHIBIT
38- IDAHO

oil heater only, none was even shipped
Out of the plant As for the Records they
were kept And the Federal Gov. has them
At the F.B.I. Bld. in Seattle.

the plant at Rathdrum ID. has Been there
since you know's when what I know about
it Mr. Bundy own it first, then Al pickett, then
(1970) Geo. Drexler, then up to Date ⁽¹⁹⁷⁹⁾ Warren Bingham.

As goes the rest the Environmental group
Took it is out of a encluse place Two foot By
Twelve Foot it consists of only wast oil and
what ever is in it. if you want to class
waste oil as hazardous waste I'm all for
it, I do not think it should Be used for
Dust oil for Roads. All waste oil's have a
Percentage of thinners and solvent's in it
Any place Gas stations - Car Dealers - Transmission
shops, Construction Co. Hiway shops Etc. use
thinners And Solvents to clean parts And
it is hazardous unless it is use for fuel
or is Rerefined not use for Dust oil.

At this time there is a group at Eastern Wash. U. that in the process of trying to get waste oil on your back, as hazardous waste for this reason they have made test on oiled roads in this Area Eastern Wash. and found that the Road owners do use hazardous oil on Road oil they do not care what they use.

As far as Person or DEI I feel that I as a Employee, ~~I~~^{I WAS} not Responsible for what comes from a higher source. That I do not have any control of,

This Complaint and Compliance order was received
June 16, 1983 by Tandy Drucker.

Thomas A. Drucker

Enclosure

cc. Carl Keck, Dep. of Health + welfare, Miss, Idaho
Ken Babin, Pankhandle Health District
Steve Proant, EPA Boise ID
L. Edwin Coate, Acting Regional Administrator
George Hifer, EPA Seattle.

June 27, 1983

Mr. Kenneth D. Feigner
U. S. Environmental Protection Agency
Region 10
M/S 533
1200 Sixth Ave.
Seattle, Washington

RECEIVED

JUN 29 1983

WASTE MANAGEMENT BRANCH

RE: Facility No. IDDO00800961

Dear Sir;

I would like to request an informal conference to see what might be done to resolve this situation. I do not have authority to speak or act for Arrcom/ George Drexler, but I may be able to assist in working on a program to get some direction to this.

This conference would have to be in Spokane, since I don't have financial resources to travel to Seattle.

Sincerely;

W. A. Pickett

W. A. Pickett
E. 803 Mission
Spokane, WA 99202

EPA EXHIBIT
39-10AHO



E. 1130 Sprague Avenue • P.O. Box 4158
Spokane, Washington 99202 • (509) 535-4131
Mailing Address: P.O. Box 369 Greenacres, WA 99016

August 2, 1982

Mr. Michael Brown
Environmental Protection Agency
Waste Management Branch
Mail Stop 533
1200-6th Avenue
Seattle, Washington 98101-3188

Dear Mr. Brown:

Enclosed are copies of the manifests you requested during your telephone conversation to me today. I have also enclosed a duplicate copy of a check sent to United for payment of one shipment of waste solvent to Arrcom, Inc. If I can be of any further assistance to you, please call me.

Sincerely,

A handwritten signature in cursive script that reads "W. Donald Lilly".

W. Donald Lilly
Manager, Quality Control Lab

Copies to:

Terry Cossette
Larry Grossman

WDL:st

RECEIVED
AUG - 5 1982

TECHNICAL OPERATIONS SECTION
EPA EXHIBIT 40

DESIGNATED FACILITY

ARRCOM, INC.
P.O. Box 56
Woodland, Washington 98674

DATE RECEIVED
11-24-80

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD 00-080-0961GENERATOR UNITED PAINT MFG, INC.ID. NO. WAD 009063546ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, Wa99016 PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
EPA HAZARDOUS WASTE # K 078 (Solvent Cleaning Waste)	820 gals.	Bulk			

DOT SHIPPING NAME SOLVENT CLEANING WASTE DOT HAZARD CLASS FLAMMABLEPHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHERMAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY)

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any materials contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency, and dated by the authorized agent of the generator.

GENERATOR SIGNATURE Howard L. LyleDATE 11/19/80TRANSPORTER Arrcom, Inc.ID. NO. 11-19-80ADDRESS P.O. Box 125 Otis OrchardsPHONE 509-926-8176TRANSPORTER SIGNATURE M R S. J. L.DATE 11/19/80TREATMENT FACILITY OR
COLLECTION SITE Decker Ent IncID. NO. 100-00-000000ADDRESS Highway 53 RT 3 Box 256 - 1/2 mile west of RathbunPHONE 509-926-8176SIGNATURE Thomas DeckerDATE 11-19-80ALTERNATE
TRANSPORTER NO. 1

ID. NO.

ADDRESS

PHONE

TRANSPORTER SIGNATURE

DATE

ALTERNATE
TRANSPORTER NO. 2

ID. NO.

ADDRESS

PHONE

TRANSPORTER SIGNATURE

DATE

ALTERNATE FACILITY

ID. NO.

ADDRESS

ARRCOM, INC.
REC. NO. 0000000000

BILL OF LADING NO.

WEIGHT TICKET NO.

GROSS

DISPOSAL AREA Decker Ent Inc SECTION

QUAD

DEPTH

TAKE

REC. BY Thomas DeckerCOMMENTS Blended fuel

DREXLER ENTERPRISES INC.

OIL PURCHASING ACCOUNT No. 1

P. O. BOX 125 621-7719

OTIS ORCHARDS, WA 99027

PAY
TO THE
ORDER OF

United Coatings
for One Dollar



SPRAGUE-ARGONNE OFFICE
FARMERS & MERCHANTS BANK
SPOKANE, WASHINGTON 99214

For

Wade Salvants

⑈001320⑈ ⑆ ⑆ 125105711 ⑆ 704 066 0⑈

1320

11/20

1980

98-574
1251

\$ 41

00

DOLLARS

⑈0000001.00⑈

FOR DEPOSIT ONLY
OLD NATIONAL BANK OF WASHINGTON
SPOKANE, WASH., OR ORDER
UNITED PAINT MFG., INC.
0019-707-9

FOR DEPOSIT ONLY
OLD NATIONAL BANK OF WASHINGTON
SPOKANE, WASH., OR ORDER
UNITED COATINGS, INC.
0019-707-9

82883-107

DESIGNATED FACILITY

ARRCOM, INC.
P.O. Box 56
Woodland, Washington 98674

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD-00-080-0961

GENERATOR UNITED PAINT MANUFACTURING, INC. ID. NO. WAD-00-906-3546
ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, Wa 99016 PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA # 1993) EPA Hazardous Waste # D 001. F.P. 27°F CC	1700 2500 gal	Bulk			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator.

GENERATOR SIGNATURE W. Donald Lilly DATE 3-3-81TRANSPORTER Arrcom ID. NO. IDD-00-080-0961ADDRESS P.O. Box 125 Otis Orchards, Wa 99027 PHONE 624-7719TRANSPORTER SIGNATURE Michael R. Smith DATE 3-3-81TREATMENT FACILITY OR COLLECTION SITE DREXLER ENTERPRISES, INC. ID. NO. IDD-00-080-0961ADDRESS Rt. 3, Box 258-A6
Rathdrum, Idaho 83858 PHONE 682-0607SIGNATURE Thomas Drexler U.P. DATE 3-3-81

ALTERNATE TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 _____ ID. NO. _____

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE W. Donald Lilly DATE 3-3-81

TRANSPORTER Arrecom ID. NO. 100-00-080-0961

ADDRESS P.O. Box 125 Otis Orchards, Wa 99027 PHONE 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 3-3-81

TREATMENT FACILITY OR
COLLECTION SITE DREXLER ENTERPRISES, INC. ID. NO. 100-00-080-0961

ADDRESS Rt. 3, Box 253-A6
Pethrum, Idaho 83258 PHONE 687-0607

SIGNATURE Thomas Drexler U.P. DATE 3-3-81

ALTERNATE
TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE
TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY _____ ID. NO. _____

ADDRESS _____

ARRCOM, INC.
REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA _____ SECTION _____ QUAD _____ DEPTH _____ TARE _____

REG. BY ARRCOM, INC. _____ NET _____

COMMENTS suited for fuel

ARRCOM, INC.
P.O. Box 30
Woodland, Washington 98674

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD-00-080-0961

GENERATOR UNITED PAINT MANUFACTURING, INC. ID. NO. WAD-00-906-3546
ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, WA 99016 PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA # 1993) EPA Hazardous Waste # <u>D 001</u> F.P. 27°F CC	1750 GAL	BULK			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY)

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substance contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE W. Donald Lilly DATE 5/12/81

TRANSPORTER Arrcom ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125 Otis Orchards, WA 99027 PHONE 624-7719

TRANSPORTER SIGNATURE William J. Martin DATE 5/12/81

TREATMENT FACILITY OR COLLECTION SITE Duplex Ent Inc. ID. NO. IDD-00-080-0961

ADDRESS Hi 53 Smiths Market PHONE 687-0857

SIGNATURE Tom Drench DATE 5-12-81

ALTERNATE TRANSPORTER NO. 1 ID. NO.

ADDRESS PHONE

TRANSPORTER SIGNATURE DATE

ALTERNATE TRANSPORTER NO. 2 ID. NO.

ADDRESS PHONE

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

This title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials
ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substance
contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition
transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed
and dated by the authorized agent of the generator:

GENERATOR SIGNATURE W. Donald Lilly DATE 5/12/81

TRANSPORTER Arrcom ID. NO. IDD-00-030-0961
ADDRESS P.O. Box 125 Otis Orchards, WA 99027 PHONE 624-7719
TRANSPORTER SIGNATURE [Signature] DATE 5/12/81

TREATMENT FACILITY OR
COLLECTION SITE Dwyer Ent Inc. ID. NO. IDD-00-030-09
ADDRESS Hi 53 5 mile marker PHONE 687-0857
SIGNATURE [Signature] DATE 5-12-81

ALTERNATE
TRANSPORTER NO. 1 _____ ID. NO. _____
ADDRESS _____ PHONE _____
TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE
TRANSPORTER NO. 2 _____ ID. NO. _____
ADDRESS _____ PHONE _____
TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY _____ ID. NO. _____
ADDRESS _____

ARRCOM, INC.
REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA _____ SECTION _____ QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. [Signature] NET _____

COMMENTS mixed in for fuel

ARRCOM, INC.
P.C. Box 56
Woodland, Washington 98674

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD-00-080-0961

GENERATOR UNITED PAINT MANUFACTURING, INC.

ID. NO. WAD-00-906-3546

ADDRESS East 19011 Cataldo (P.O. Box 369) Greenacres, WA 99016 PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA # 1993) EPA Hazardous Waste # D 001. F.P. 27 F CC	200	61/k			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD (800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE W. Donald Lilly DATE 6/9/81

TRANSPORTER Arrcom ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125 Otis Orchards, WA 99027 PHONE 624-7719

TRANSPORTER SIGNATURE W. H. Smith DATE 6/9/81

TREATMENT FACILITY OR COLLECTION SITE Duplex Ent Inc. ID. NO. IDD-00-080-0961

ADDRESS Highway 53 5-mile marker PHONE 687-0857

SIGNATURE Tom Duplex DATE 6-9-81

ALTERNATE TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator.

GENERATOR SIGNATURE W. Donald Lillis DATE 6/9/81

TRANSPORTER Arrcom ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125, Otis Orchards, WA 99027 PHONE 624-7719

TRANSPORTER SIGNATURE ADD R. S. 2000 DATE 6/9/81

TREATMENT FACILITY OR COLLECTION SITE Depler Ent Line ID. NO. IDD-00-080-0961

ADDRESS Highway 53 5-mile marker PHONE 687-0857

SIGNATURE Tom Depler DATE 6-9-81

ALTERNATE TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY _____ ID. NO. _____

ADDRESS _____

ARRCOM, INC. REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA _____ SECTION _____ QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. Tom Depler NET _____

COMMENTS used for fuel

ARRCOM, INC.
P.O. Box 56
Woodland, Washington 98674

RECEIVED

JUL 22 1981

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD-00-080-0961 UNITED PAINT - UNITED COATINGS

GENERATOR UNITED PAINT MANUFACTURING, INC. ID. NO. WAD-00-906-3546
ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, WA 99016 PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA # 1993) EPA Hazardous Waste # D 001. F.P. 27°F CC	1650 GAL	BULK			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY)

IN THE EVENT OF A SPILL CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8302.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator.

GENERATOR SIGNATURE W. Donald Lilly DATE 7-13-81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125015, ORCHARDS, WA 99027 PHONE 624-7719

TRANSPORTER SIGNATURE William A. Martin DATE 7-13-81

TREATMENT FACILITY OR COLLECTION SITE Phaxley Env't Inc. ID. NO. IDD-00-080-0961

ADDRESS H. 53 mile S PHONE 607-6857

SIGNATURE W.A. Dwyer DATE 7-14-81

ALTERNATE TRANSPORTER NO. 1 ID. NO.

ADDRESS PHONE

TRANSPORTER SIGNATURE DATE

ALTERNATE TRANSPORTER NO. 2 ID. NO.

ADDRESS PHONE

DATE

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8302.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator.

GENERATOR SIGNATURE W.D. David Lilly DATE 7-13-81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125015, ORCHARD, WA. 99027 PHONE 624-7719

TRANSPORTER SIGNATURE William H. Martin DATE 7-13-81

TREATMENT FACILITY OR COLLECTION SITE Donner Env't Inc. ID. NO. IDD-00-080-0961

ADDRESS H. 53 mile S PHONE 607-6857

SIGNATURE W.A. Dwyer DATE 7-14-81

ALTERNATE TRANSPORTER NO. 1 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY ID. NO. _____

ADDRESS _____

ARRCOM, INC. REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA _____ SECTION _____ QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. _____ NET _____

COMMENTS Mixed for fuel

ARRCOM, INC.
P.O. Box 56
Woodland, Washington 98674

RECEIVED

AUG 12 1981

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD-00-080-0961

UNITED PAINT - UNITED COATINGS
SPokane, WA

GENERATOR UNITED PAINT MANUFACTURING, INC. ID. NO. WAD-00-906-3546

ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, WA 99016 PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA# 1993) EPA Hazardous Waste #D 001. F.P. 27 F CC	1200 Gallons	Bulk			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8302.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substance contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE Ken Lilly DATE 7/29/81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125 Otis Orchards, WA 99027 PHONE 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 7/29/81

TREATMENT FACILITY OR
COLLECTION SITE Drexler Ent. Inc. ID. NO. IDD-00-080-0961

ADDRESS Hiway 53 marker #5 PHONE 687-0859

SIGNATURE Thomas Dwyer DATE 7-29-81

ALTERNATE
TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE
TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8302.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substance contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE Don Lilly DATE 7/29/81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-C961

ADDRESS P.O. Box 125 Otis Orchards, WA 99027 PHONE 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 7/29/81

TREATMENT FACILITY OR
COLLECTION SITE Drexler Ent. Inc. ID. NO. IDD-00-080-C961

ADDRESS Highway 53 near mile 15 PHONE 687-0857

SIGNATURE Thomas Drexler DATE 7-29-81

ALTERNATE
TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE
TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY _____ ID. NO. _____

ADDRESS _____

ARRCOM, INC.
REC. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA E2-RRC SECTION side QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. _____ NET _____

COMMENTS _____

GENERATOR UNITED PAINT MANUFACTURING, INC. ID. NO. WAD-00-006

ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, Wa 99016 PHONE (509)

WASTE DESCRIPTION	CONTAINER QUANTITY	TYPE	GAL	LB.
Solvent N.O.S. (NA # 1993) EPA Hazardous Waste # D 001. F.P. 27 F CC	1150 Gallons	Bulk		

From Ted.
ARRCOM
Waste Handbook

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY)

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD (800) 424-8302.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator.

GENERATOR SIGNATURE W. Donald Lilly DATE 9-17-81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0061

ADDRESS P.O. Box 125, Otis Orchards, Wa 99027 PHONE 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 9-17-81

TREATMENT FACILITY OR COLLECTION SITE D.E.I. ID. NO. FDD-00-080-0061

ADDRESS Happy 53 mile marker PHONE 682-0857

SIGNATURE Thomas Doyle Plant Manager DATE 9-17-81

ALTERNATE TRANSPORTER NO. 1 ID. NO.

ADDRESS PHONE

TRANSPORTER SIGNATURE DATE

ALTERNATE TRANSPORTER NO. 2 ID. NO.

ADDRESS PHONE

TRANSPORTER SIGNATURE DATE

ALTERNATE FACILITY ID. NO.

ADDRESS

ARRCOM, INC. BILL OF LADING NO. WEIGHT TICKET NO. GROSS

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator.

GENERATOR SIGNATURE W. Donald Lilly DATE 9-17-81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0061

ADDRESS P.O. Box 125, Otis Orchards, Wa 98027 PHONE 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 9-17-81

TREATMENT FACILITY OR COLLECTION SITE D.E.I. ID. NO. FDD-00-080-0061

ADDRESS Highway 53, 5 mile marker PHONE 687-0857

SIGNATURE Thomas Duyle Plant Manager DATE 9-17-81

ALTERNATE TRANSPORTER NO. 1 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY ID. NO. _____

ADDRESS _____

ARRCOM, INC. REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA Sub SECTION _____ QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. Burroughs NET _____

COMMENTS Weight for burning

DESIGNATED FACILITY

ARRCOM, INC.

P.O. Box 56

Woodland, Washington 98674

RECEIVED

NOV 23 1981

UNITED PAINT - UNITED COATING CHEMICAL TRANSPORTATION MANIFEST
SPokane, WA.ID. NO. IDD-00-080-0961GENERATOR UNITED PAINT MANUFACTURING, INC.ID. NO. WAD-00-906-3546ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, WA 99016PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA# 1993) EPA Hazardous Waste # Dool. F.P. 27 F CC.	1500 GAL	Bulk			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable LiquidPHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

Title to all materials furnished for disposal herein shall be deemed to be vested in ARRCOM, INC., immediately upon acceptance of such materials by ARRCOM, INC., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by ARRCOM, INC.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE W. Donald Lilly DATE 11/3/81TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961ADDRESS P.O. Box 125, Otis Orchards, WA 99027 PHONE (509) 624-7719TRANSPORTER SIGNATURE MB [Signature] DATE 11/2/81TREATMENT FACILITY OR COLLECTION SITE Arcon oil Co. ID. NO. IDD-00-080-0961ADDRESS Highway 53 - 5 mile marker PHONE (206) 687 0857SIGNATURE Thomas Drepper DATE 11-3-81

ALTERNATE TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 _____ ID. NO. _____

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
 PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
 MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
 SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
 CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
 (800) 424-8802.

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GENERATOR SIGNATURE W. W. Dwyer DATE 11/3/81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125, Otis Orchards, WA 99027 PHONE (509) 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 11/2/81

TREATMENT FACILITY OR COLLECTION SITE Arcom Oil Co. ID. NO. IPP-00-070-0761

ADDRESS Highway 53 - 5 miles marker PHONE (206) 687 0857

SIGNATURE Thomas Dwyer DATE 11-3-81

ALTERNATE TRANSPORTER NO. 1 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY ID. NO. _____

ADDRESS _____

ARRCOM, INC. REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA _____ SECTION _____ QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. Thomas Dwyer NET _____

COMMENTS Disposal 11-4-81

DESIGNATED FACILITY

ARRCOM, INC.

P.O. Box 56

Woodland, Washington 98674

CHEMICAL TRANSPORTATION MANIFEST

ID. NO. IDD-00-080-0961GENERATOR UNITED PAINT MANUFACTURING, INC.ID. NO. WAD-00-906-3546ADDRESS E. 19011 Cataldo (P.O. Box 369) Greenacres, WA 99016PHONE (509) 926-8176

WASTE DESCRIPTION	CONTAINER		GAL	LB.	FT.
	QUANTITY	TYPE			
Solvent N.O.S. (NA# 1993) EPA Hazardous Waste # Dool. F.P. 27 F CC	450 gals.	Bulk			

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable LiquidPHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHERMAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY)

IN THE EVENT OF A SPILL CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
(800) 424-8802.

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GENERATOR SIGNATURE *W. Donald Lilly* DATE 12/3/81TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961ADDRESS P.O. Box 125, Otis Orchards, WA 99027 PHONE (509) 624-7719TRANSPORTER SIGNATURE *W. Donald Lilly* DATE 12/3/81TREATMENT FACILITY OR COLLECTION SITE Arrcom Inc. ID. NO. IDD-00-080-0961ADDRESS P.O. Box 125, Highway 52 - 5 1/2 mile north PHONE (509) 624-7719SIGNATURE *W. Donald Lilly* DATE 12-3-81

ALTERNATE TRANSPORTER NO. 1 ID. NO.

ADDRESS PHONE

TRANSPORTER SIGNATURE DATE

ALTERNATE TRANSPORTER NO. 2 ID. NO.

DOT SHIPPING NAME Solvent N.O.S. DOT HAZARD CLASS Flammable Liquid
PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____
MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____
SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT DEPARTMENT OF ECOLOGY (509) 456-2926 AND/OR
CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD
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GENERATOR SIGNATURE W. Donald Lilly DATE 12/3/81

TRANSPORTER ARRCOM ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125, Otis Orchards, WA 99027 PHONE (509) 624-7719

TRANSPORTER SIGNATURE [Signature] DATE 12/3/81

TREATMENT FACILITY OR COLLECTION SITE ARRCOM, Inc. ID. NO. IDD-00-080-0961

ADDRESS P.O. Box 125, Highway 53 - 5 1/2 mile north PHONE (509) 624-7719

SIGNATURE [Signature] DATE 12-3-81

ALTERNATE TRANSPORTER NO. 1 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY ID. NO. _____

ADDRESS _____

ARRCOM, INC. REG. NO. _____ BILL OF LADING NO. _____ WEIGHT TICKET NO. _____ GROSS _____

DISPOSAL AREA #1 TANK SECTION _____ QUAD _____ DEPTH _____ TARE _____

REC. BY ARRCOM, INC. [Signature] NET _____

COMMENTS stripped for fuel for Burners

WE doing TESTS for flammability, etc for disposal

228

ARRCOM, RATHDRUM, IDAHO

30-35 K GAL ON SITE

disposal @ \$1.00/gal → \$2.00/gal

est: \$90-100 K for removal (low est)
up to \$130K

	CHEMICAL NAME	SOIL T17	SOIL T19	SOIL LOADING PACE	LIQUID T8	LIQUID T9	LIQUID T10	LIQUID T11	LIQUID T17	LIQUID T19		
V	ETHYL BENZENE		20,000,000		3,100,000	1,400,000	4,400,000	1,600,000	11,000	12,000		
V	TOLUENE				1,200,000	1,100,000	1,100,000	900,000	3,200	7,500		
V	METHYLENE CHLORIDE					130,000						
V	TETRA CHLORO ETHYLENE				330,000	290,000	310,000	100,000				
V	XYLENE	1.3	170		10,000,000	10,300,000	9,000,000	7,500,000	606,000	17,500		
V	2-BUTANONE								95,000			
V	2-PENTANONE								39,000			
V	4-METHYL 2-PENTANONE						800,000					
V	ETHANOL								46,000			
V	TRIMETHYL BENZENE		70			30,000,000						
V	METHYL CYCLOHEXANE		25		2,500,000	2,400,000	2,400,000	500,000				
V	TETRA METHYL PENTANE						700,000					
V	3-METHYL HEXANE				3,400,000							
V	HEXANE							500,000				
V	ACETONE	3		64					63,000	460,000		
BN	NAPHTHALENE								85			
BN	BIS(2-ETHYL HEXYL) PHTHALATE								220			
BN	DIETHYL PHTHALATE								200			
BN	CHYSENE								55			
A	PHENOL								32,000			
	ETHYL BENZENE								114,000			
	1,2-DIMETHYL BENZENE								440,000			
	1,3-DIMETHYL BENZENE								91,000			
	1-METHYL ETHYL BENZENE								13,000			
	1,3-TRIMETHYL BENZENE								16,000			
	1-METHYL 2-PYROLIDINONE								5,100,000			
	PCB (PPM)	8	2.9	—	<1	<1	<1	<1	—	<1		

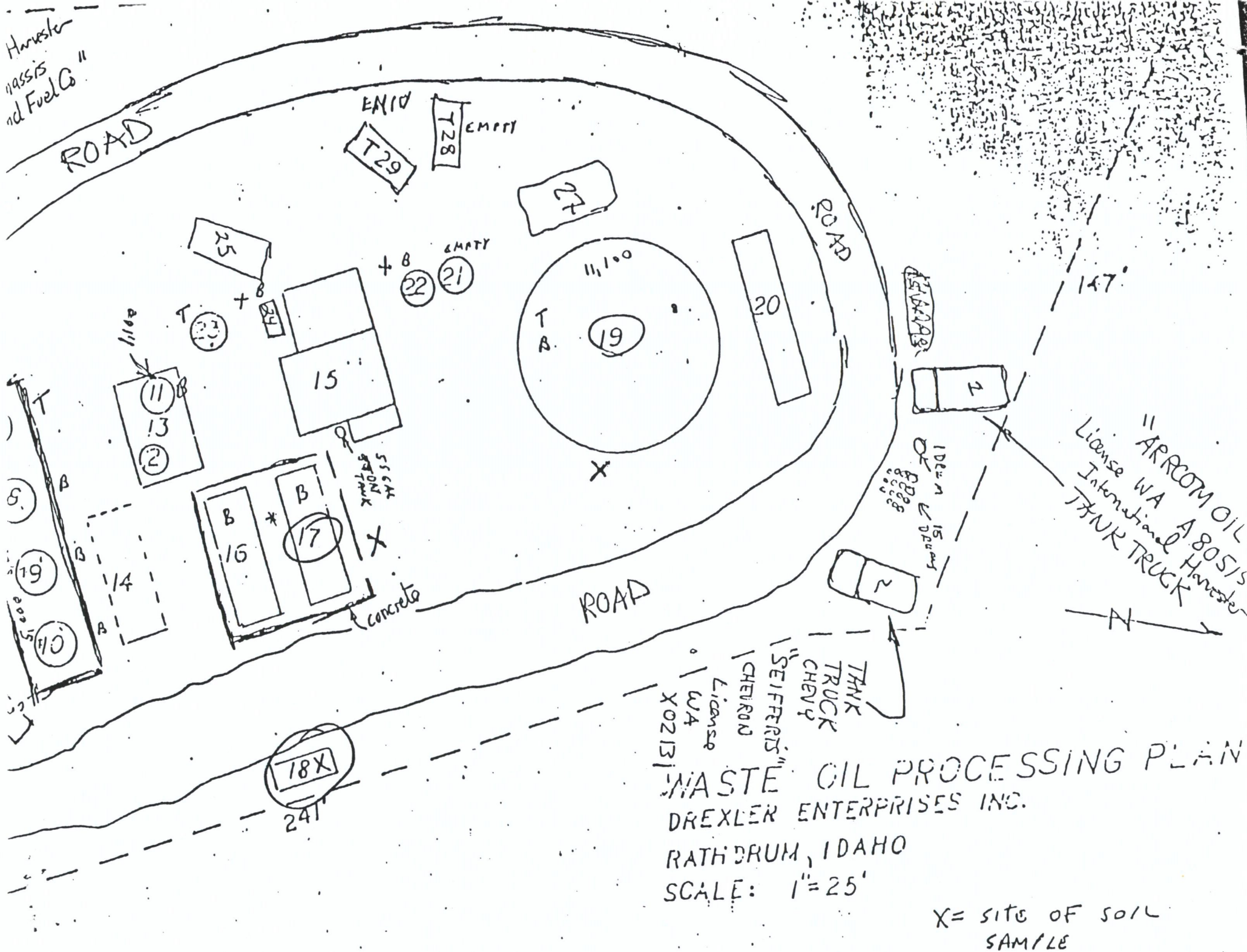
NOTE: ALL VALUES EXPRESSED AS PARTS PER BILLION UNLESS OTHERWISE NOTED

BN = BASIC/NEUTRAL COMPOUNDS, A = ACID COMPOUNDS, V = VOLATILES

EPA EXHIBIT
41-IDAHO

Harvester
"Assis
nd Fuel Co "

ROAD



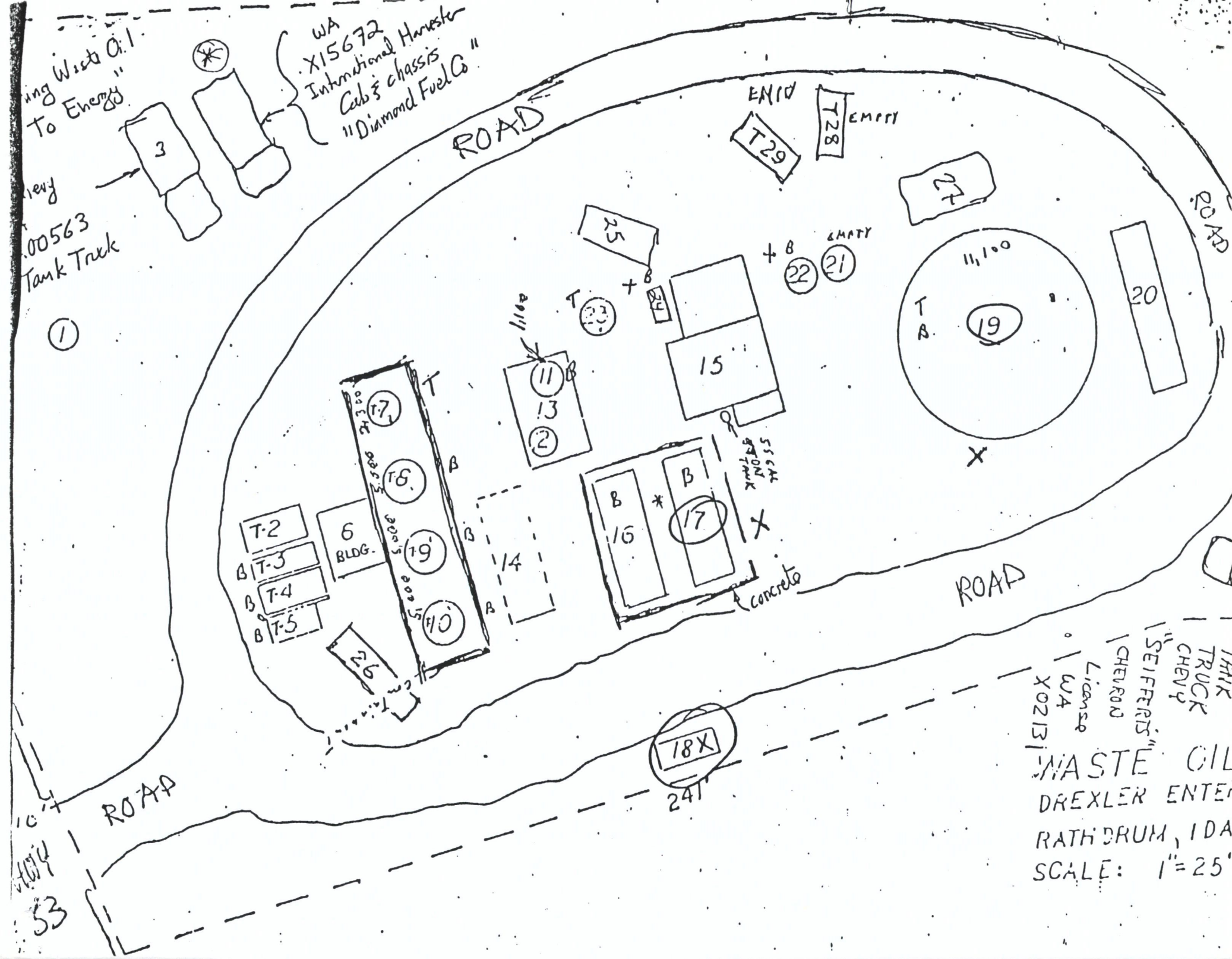
WASTE OIL PROCESSING PLAN
DREXLER ENTERPRISES INC.
RATHDRUM, IDAHO
SCALE: 1"=25'

X = SITE OF SOIL SAMPLE

ing Waste Oil
To Energy

very
00563
Tank Truck

WA
X15672
International Harvester
Cub & chassis
"Diamond Fuel Co"



THANK
TRUCK
CHEVY
"SEIFFERTS"
License
WA
X0213
WASTE OIL
DREXLER ENTER
RATHDRUM, IDA
SCALE: 1"=25'

Penalty Worksheet

American Radiolab 37000/080/0961

4-26-83

Mike Brown

Ref Cite	RCRA Cite	Description	Class	Damage	Conduct	Upper	Lower	Actual	
6	40 CFR 122.4(b)	Signature	I III	Min Maj	Maj	950 25,000	750 20,000	850 22,500	
8	RCRA 3005	Disposing w/o permit	I	Maj	Maj	25,000	20,000	22,500	
1(b)	265.14	Security	I	Maj Min	Maj	25,000 2,000	20,000 2,500	22,500 2,500	
1(b)	265.31	Operate w/o release	I III	Maj Min	Maj Min	5,000 2,500	4,000 500	4,500 3,500	similar to RCRA 3005
1(b)	265.32	Safety Equipment	I III	Maj Min	Maj	5,000 4,000	4,000 8,000	4,500 7,500	
1(b)	Subject H	Financial	I	Maj	Maj	-	-	-	Not operating on effective date
0(a)	265.13(b)	Waste analysis	III	Maj	Maj	5000	4000	4,500	←
0(b)	265.15(b)(1)	inspection schedule	III	Maj Min	Maj	5,000 2,200	4,000 1,750	4,500 1,750	
0(c)	265.16	Training schedule	III	Min	Maj	950	750	800	
10(b)	265.37	contingency arrangements	III	Min	Maj	950	750	800	
0(e)	265.51(k)	contingency plan	III	Min Maj	Maj	2,200 950	1,750 750	1975 800	
0(b)	265.71	manifest	III	Mod	Maj	2,200	1,750	1975	
0(b)	265.73	operating	III	Mod	Maj	2,200	1,750	1975	
0(b)	Subject 6	closure plan	III	Mod	Maj	2,200	1,750	1975	
								73,350	
								11,725	
								25,125	

EPA EXHIBIT H2-1DAHO

CORRECTED PENALTY CALCULATION